

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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In the Matter of the Application of San Diego Gas & )  
Electric Company (U 902 G) and Southern California )  
Gas Company (U 904 G) for Authority to Integrate )  
Their Gas Transmission Rates, Establish Firm Access )  
Rights, and Provide Off-System Gas Transportation )  
Services. )  
\_\_\_\_\_)

A.04-12-004  
(Filed December 2, 2004)

**JOINT COMMENTS OF  
PACIFIC GAS AND ELECTRIC COMPANY (U 39 G),  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), AND  
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)  
ON OFF-SYSTEM DELIVERY ISSUES**

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SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)  
ON OFF-SYSTEM DELIVERY ISSUES**

In accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company ("PG&E"), San Diego Gas & Electric Company ("SDG&E"), and Southern California Gas Company ("SoCalGas") hereby submit the following joint comments on the off-system delivery issues addressed in the Proposed Decision ("PD") and the Alternate Proposed Decision ("APD") issued October 31, 2006 in the above-captioned proceeding.<sup>1/</sup> The PD/APD properly identify various benefits associated with off-system delivery service from SDG&E/SoCalGas to PG&E, such as downward pressure on the price of natural gas for the entire California market, and proposes appropriate measures to encourage off-system deliveries. As part of this effort to encourage access to additional gas supplies, the Commission should encourage

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<sup>1/</sup> Counsel for SDG&E and SoCalGas have been authorized by counsel for PG&E to make this filing on PG&E's behalf. SDG&E, SoCalGas, and PG&E will be submitting separate comments on the other issues addressed in the PD and APD.

SDG&E/SoCalGas and PG&E to fully develop firm delivery options on the combined transmission systems of the three major California gas utilities. This will ensure that the benefits of new gas supplies will be realized by the entire state. In this proceeding, the Commission should direct the three California utilities to file a joint application proposing options and facilities necessary to provide such firm off-system deliveries simultaneously with the facilities necessary to provide off-system deliveries on SDG&E/SoCalGas to other interconnections besides PG&E. This will permit the three California utilities to optimize their combined transmission facilities necessary to provide access to new supplies and new markets on a least-cost basis. Such an approach will minimize the potential for duplicate or underutilized facilities to be installed under the more narrow approach envisioned in the PD/APD.

## **I.**

### **PG&E, SDG&E, AND SOCALGAS STRONGLY SUPPORT OFF-SYSTEM DELIVERIES**

PG&E, SDG&E, and SoCalGas appreciate the commitment expressed in the PD/APD to off-system deliveries from SDG&E/SoCalGas to PG&E. As the PD/APD correctly point out:

Off-system service will benefit northern California because additional gas supplies will be able to flow to customers of PG&E. These additional gas supplies flowing through the transmission systems of SDG&E, SoCalGas, and PG&E are likely to put downward pressures on the price of natural gas to the benefit of the entire California market. Off-system deliveries can also reduce transmission costs if system throughput is increased on the SDG&E and SoCalGas system as a result of these deliveries.<sup>2/</sup>

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<sup>2/</sup> PD/APD, p. 112.

PG&E, SDG&E, and SoCalGas wholeheartedly agree that off-system deliveries of gas supplies from SDG&E/SoCalGas to PG&E will provide gas commodity price benefits to the entire state of California. In addition, new supplies arriving in southern California can provide important reliability benefits to gas customers in northern California if gas supplies from traditional gas producing basins serving northern California should decline or seek other markets. It is vitally important that gas consumers in the entire state of California obtain access to all new gas supplies entering the state. Accordingly, PG&E, SDG&E, and SoCalGas urge the Commission to adopt policies that will encourage the firm delivery of gas supplies from the SDG&E/SoCalGas transmission system to the PG&E system so that the benefits of new gas supplies will be realized by the entire state.

## **II.**

### **OFF-SYSTEM DELIVERIES WILL PROMOTE NEW GAS SUPPLIES AND PRODUCE ADDITIONAL BENEFITS FOR THE STATE OF CALIFORNIA**

As discussed above, there can be no question that off-system deliveries by SDG&E/SoCalGas to PG&E will provide benefits to the entire state of California. Additional benefits can be realized from off-system deliveries from the three California gas utilities to markets outside California. As the PD/APD note, “[a]s mentioned by many of the parties, off-system service provides gas suppliers with another market to sell their gas. This is particularly attractive to the LNG project sponsors who seek to provide gas supplies at various west coast locations.”<sup>3/</sup> The PD/APD specifically recognize the benefits of deliveries by SDG&E/SoCalGas to pipelines other than PG&E:

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<sup>3/</sup> *Id.*

Several parties suggest that off-system deliveries to other pipelines are needed. We recognize that the suppliers of gas would like to pursue markets other than just PG&E. With the potential for large quantities of LNG to reach California, the opening of new markets is of tremendous importance to these shippers. To the extent the opening of new markets utilize the facilities of California-regulated gas utilities, that can help to reduce the transmission rates of California customers. The flow of additional gas supplies through the transmission systems of the California utilities should also result in more competition among gas suppliers.<sup>4/</sup>

To the extent that providing access to the entire western gas market will attract new LNG terminals to the west coast, the additional gas supplies delivered by such terminals will provide substantial benefits in addition to those obtained from new supplies serving just the California market. It is indisputable that the benefits of gas-on-gas competition will increase if LNG developers can obtain access to the entire western gas market and therefore decide to bring additional new gas supplies to the entire California market. The ability of PG&E to provide off-system deliveries to markets outside California under its Gas Accord tariffs has provided undeniable benefits to customers in northern California from greater gas-on-gas competition and increased transmission throughput that has reduced the backbone transmission rate for all customers. The Commission therefore should adopt policies now that will send the signal to LNG developers that they will have access to the entire western gas market and that the terms and conditions of such access will be adopted by the Commission at the earliest possible date.

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<sup>4/</sup> *Id.* at 116.

### III.

#### **THE COMMISSION SHOULD REVIEW THE FACILITIES NECESSARY TO PROVIDE ALL OFF-SYSTEM DELIVERIES AT THE SAME TIME**

The PD/APD note that “PG&E prefers that the off-system delivery from SoCalGas occur at Kern River Station, but recognizes that potential shippers may decide another location is more preferable.”<sup>5/</sup> The PD/APD then state that the Commission will “let the market decide” the delivery point from SoCalGas to PG&E and requires the utilities to work together to identify the facility costs necessary to deliver gas into the PG&E system so that shippers will be able to know the total delivered transportation cost.<sup>6/</sup> The PD/APD order SDG&E and SoCalGas to hold an open season for firm off-system deliveries to PG&E and to file an application for approval.<sup>7/</sup>

While recognizing the benefit of off-system deliveries to other markets, the PD/APD would not permit SDG&E and SoCalGas to even address such deliveries until the filing of an application made no earlier than May 1, 2008, referring to unspecified jurisdictional concerns and the timing of new LNG projects. Such an approach creates a real risk that transmission facilities in California will not be fully studied and optimized, and the opportunity to install only least-cost transmission facilities may be lost. For example, if SDG&E and SoCalGas hold an open season for firm off-system deliveries only to PG&E, and if the results of that open season indicate that facilities should be built for delivery of such supplies at Kern River Station, a subsequent open season for

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<sup>5/</sup> *Id.* at 112.

<sup>6/</sup> *Id.*

<sup>7/</sup> *Id.* at 113.



deliveries to other pipelines might (and likely would) indicate that facilities should be installed at Kramer Junction since facilities at this location would allow firm off-system deliveries to be made to pipelines other than PG&E, such as Kern River Gas Transmission Company, Mojave Pipeline Company, and El Paso Natural Gas Company (through Mojave). Since facilities at Kramer Junction can **also** be used to provide off-system deliveries to PG&E, the facilities initially installed to deliver firm off-system supplies to PG&E at Kern River Station might turn out to be unnecessary, or at least not fully utilized, if the additional facilities are later installed at Kramer Junction. This would result in the sub-optimal combination of facilities necessary to serve both northern California and non-California markets. PG&E, SDG&E, and SoCalGas submit that it is not in the public interest to over-build their gas transmission systems, yet such a result would likely occur under the approach proposed by the PD/APD.

In order to avoid this result, PG&E, SDG&E, and SoCalGas have recently undertaken preliminary work to identify the facilities that would best be utilized to deliver gas from southern to northern California, and other measures that will permit the California utilities to optimize their transmission systems. The utilities believe that they can work in a cooperative fashion to identify the optimal mix of transmission facilities on both systems that would provide the least cost option to transport new gas supplies. Through such a collaborative effort, PG&E, SDG&E, and SoCalGas intend to use joint transmission planning tools to avoid the installation of duplicative or underutilized transmission facilities. Such work would benefit the entire California market by ensuring that unnecessary transmission facilities are not constructed, and by assuring LNG developers that their gas can be transported at the lowest possible transportation cost.

The Commission therefore should not approach off-system deliveries in the sort of bifurcated manner envisioned under the PD/APD. Instead, the Commission should encourage the utilities to continue the work they have already begun to identify the optimal mix of transmission facilities necessary to transport new gas supplies within California, as well as off-system deliveries to all other gas markets. Specifically, the Commission should order PG&E, SDG&E, and SoCalGas to file an application within six months of the issuance of a final decision in this proceeding to identify specific transmission projects that would optimize their gas transmission systems in anticipation of future new gas supplies and to propose a process for assessing market interest in new supplies, such as open seasons. In such an application, *inter alia*, the utilities would identify the costs of specific projects and propose the sequence that the Commission should adopt for such projects to support new gas supplies as they materialize. Given the potentially long lead time for transmission pipeline and compressor station construction, it is not too soon to consider the facilities that will become necessary as commitments are made in the future for new gas supplies and as upstream facilities are nearer to construction.

#### **IV.**

#### **THERE ARE NO JURISDICTIONAL PROBLEMS ASSOCIATED WITH OFF-SYSTEM DELIVERIES**

The PD/APD suggest that there are jurisdictional issues associated with the delivery of gas supplies by SDG&E/SoCalGas to markets other than northern California. This is not the case, as evidenced by the fact that PG&E has been making off-system

deliveries to markets outside of California since the inception of its Gas Accord market structure.

The Commission should not be concerned that off-system deliveries by California gas utilities would create any jurisdictional concerns. The Federal Energy Regulatory Commission (“FERC”) has held in many cases for many years that transportation of natural gas pursuant to a “blanket” or “limited” transportation certificate under 18 C.F.R. § 284.224 allows local distribution companies (“LDCs”) like PG&E, SDG&E, and SoCalGas to transport gas in interstate commerce without affecting the jurisdiction of state agencies like this Commission over such LDCs as provided by the “Hinshaw” exemption to the Natural Gas Act.<sup>8/</sup> PG&E has transported gas off of its system to out-of-California markets under its blanket transportation certificate authority from the FERC without any adverse effect on its Hinshaw status. SDG&E and SoCalGas also have blanket transportation certificates.<sup>9/</sup> Indeed, in a case dealing with an LDC transporting regasified LNG to points outside of Massachusetts, the FERC issued the LDC a blanket certificate and ruled:

This will allow Boston Gas to perform the transportation service for DOMAC without impairing the continuing validity of its Hinshaw status under the NGA. *See* 18 C.F.R. § 284.221(d)(2).<sup>10/</sup>

In granting PG&E its blanket transportation certificate, the FERC specifically addressed and rejected the contention that doing so would jeopardize PG&E’s Hinshaw

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<sup>8/</sup> 15 U.S.C. § 717(c).

<sup>9/</sup> *See Southern California Gas Company*, 41 FERC ¶ 62,173 (1987); *San Diego Gas & Electric Company*, 64 FERC ¶ 61,221 (1993).

<sup>10/</sup> *See Boston Gas Company*, “Order on Remand Affirming Prior Order,” 70 FERC ¶ 61,121 at 61,327 (1995).

exemption.<sup>11/</sup> The FERC discussed how a Hinshaw-exempt LDC may transport gas under such a limited jurisdiction certificate to avoid losing its Hinshaw exemption:

In carrying out its mandate under the NGA the Commission has also seen fit to issue limited jurisdictional certificates. The Commission has issued limited jurisdiction certificates authorizing a specific activity when the activity is found to be within the Commission's regulatory domain and in the public interest. The Commission has elected to issue a limited jurisdiction certificate in circumstances where it seeks to authorize nonjurisdictional parties (LDCs, intrastate pipelines, or Hinshaw-exempt pipelines) to engage in a specific activity while assuring such parties that their participation in the described activity will not result in the Commission's asserting jurisdiction over any of their other operations.<sup>12/</sup>

The FERC's blanket and limited jurisdiction certificates have provided a means by which Hinshaw-exempt LDCs have been able to remain subject to state regulation while engaging in transactions that would otherwise result in the loss of the Hinshaw exemption.<sup>13/</sup> The Commission therefore should have no concerns with SDG&E or SoCalGas transporting gas off-system to out-of-state markets because doing so would not affect their status as Hinshaw-exempt LDCs subject to the regulation of this Commission.

## V.

### CONCLUSION

PG&E, SDG&E, and SoCalGas appreciate the commitment expressed in the PD/APD to off-system deliveries generally, and specifically such deliveries from

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<sup>11/</sup> *Pacific Gas and Electric Company*, 69 FERC ¶ 61,140 at 61,505-06 (1994) (footnote omitted).

<sup>12/</sup> *Id.*

<sup>13/</sup> *See also Mid Continent Market Center, Inc. v. Panhandle Eastern Pipe Line Company*, 86 FERC ¶ 61,259 (1999) (FERC allowed a company to retain its Hinshaw status even for an abandoned interstate pipeline it acquired that interconnected with interstate pipelines at both ends and where there was no question that gas it would receive was both in interstate commerce and would leave the state).

southern California to northern California. In order to fully realize the potential benefits for the entire California market, the approach to off-system deliveries adopted in the PD/APD should be modified in scope to permit the California utilities to work together to identify the optimal combination of gas transmission facilities on the entire California gas transmission network that will result in the least-cost approach to off-system deliveries. Accordingly, the Commission should order PG&E, SDG&E, and SoCalGas to file an application within six months of the effective date of a final decision in this proceeding to identify specific transmission projects and the sequencing of these projects that will be necessary as future gas supply events dictate. The specific modifications necessary to the PD/APD to address these concerns are set forth in Appendix "A" hereto.

Respectfully submitted,

By: \_\_\_\_\_ /s/ David J. Gilmore

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November 20, 2006

**APPENDIX A**  
**SUBJECT INDEX AND**  
**PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

**I. SUBJECT INDEX**

- P. 113 - The following language should be inserted at the end of the first full paragraph after the words "... application is filed":

"As discussed below, we will order SDG&E, SoCalGas, and PG&E to file an application within six months of the effective date of this decision to address the specific transmission projects that will permit the utilities to optimize the facilities necessary for firm off-system deliveries of new gas supplies and the process for determining market interest in new supplies, such as open seasons."

- PP. 116-17 - The following sentence should be deleted: "However, the use of SoCalGas' transmission facilities to transport gas to points outside of California raises FERC jurisdictional issues pertaining to the Hinshaw exemption of SoCalGas' transmission system, and has operational ramifications for intrastate transmission. (See 15 U.S.C. § 717(c))."

- P. 117 – The first full paragraph on p. 117 should be deleted in its entirety, starting with "As we move forward ..." and ending with "with respect to all their intrastate customers."

- P. 117 – The paragraph noted immediately above should be replaced with the following:

"We recognize that firm transportation between the state's gas utilities will benefit California and that firm deliveries to markets outside California will also provide significant benefits to California by attracting additional LNG supplies to the state. We are concerned that the construction of transmission facilities necessary to provide firm off-system deliveries only to PG&E might not be necessary, or might be underutilized, depending on which transmission facilities would be necessary to deliver firm supplies to markets outside California. Accordingly, we order SDG&E, SoCalGas, and PG&E to file an application within six months of the effective date of this decision to identify specific transmission projects that would provide the optimal combination of such facilities to permit firm off-system deliveries of new gas supplies."

P. 134 – Finding of Fact No. 41 should be revised to read as follows:

“SDG&E and SoCalGas propose to offer firm ~~backhaul~~-service and interruptible off-system service through backhaul.”

P. 136 – Conclusion of Law No. 16 should be deleted.

P. 137 – Conclusion of Law No. 17 should be deleted.

P. 139 – Ordering Paragraph No. 7 should be deleted and replaced with the following:

“SDG&E, SoCalGas, and PG&E shall file an application within six months of the effective date of this decision identifying specific gas transmission projects to optimize the construction of gas transmission facilities necessary to provide firm off-system services and to propose a process for determining market interest in new supplies requiring such services.

## **II. PROPOSED FINDINGS AND CONCLUSIONS**

### **A. Proposed Findings of Fact:**

- (1) Off-system services will promote the flow of additional gas supplies through the transmission systems of SDG&E, SoCalGas, and PG&E, and thereby put downward pressures on the price of natural gas for the benefit of the entire California market.
- (2) SDG&E, SoCalGas, and PG&E should be encouraged to identify the optimal mix of gas transmission facilities necessary to provide off-system services.

### **B. Proposed Conclusion of Law:**

SDG&E, SoCalGas, and PG&E should file an application within six months of the effective date of this decision identifying specific gas transmission projects necessary to make off-system deliveries on a firm basis and proposing a process to determine market interest in new supplies requiring such deliveries.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing **JOINT COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 G), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON OFF-SYSTEM DELIVERY ISSUES** on all parties of record in A.04-12-004 by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission.

Dated at Los Angeles, California, this 20<sup>th</sup> day of November, 2006.

\_\_\_\_\_  
/s/ Becky Roberts

Becky Roberts



**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**Service Lists - Proceeding: A04-12-004 - Last changed: November 15, 2006**

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